

PX 26

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

IN RE BANK OF AMERICA CALIFORNIA)
UNEMPLOYMENT BENEFITS LITIGATION,)
)
)
_____) Case No.
3:21-md-02992-GPC-MSB
)
This Document Relates to All)
Actions)
_____)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
REMOTE VIDEOTAPED DEPOSITION OF PAUL SIMPSON

Taken On
Friday, February 21, 2025

STENOGRAPHICALLY REPORTED BY:
SHAYNA LUTSKY, CSR 14554
JOB NO.: 10157867

Highly Confidential - Attorneys' Eyes Only

Paul Simpson

In Re Bank of America CA Unemployment Benefits Litigation

1 UNITED STATES DISTRICT COURT

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11 REMOTE VIDEOTAPED DEPOSITION of PAUL SIMPSON, taken
12 remotely via Zoom on behalf of the Plaintiffs,
13 commencing at 8:35 a.m., and ending at 11:09 a.m. on
14 Friday, February 21, 2025, before Shayna Lutsky,
15 Certified Shorthand Reporter No. 14554.

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Paul Simpson

In Re Bank of America CA Unemployment Benefits Litigation

1 APPEARANCES:

2 FOR THE PLAINTIFFS:

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In Re Bank of America CA Unemployment Benefits Litigation

1 APPEARANCES: (Cont.)

2
3 FOR THE DEFENDANT BANK OF AMERICA:

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11

12

13 ALSO PRESENT:

14 Peter Luc
15 Spencer Benveniste, the Videographer

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17

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In Re Bank of America CA Unemployment Benefits Litigation

1 Friday, February 21, 2025, 8:35 a.m.

2
3 THE VIDEOGRAPHER: Okay. We're on the
4 record. Today's date is February 21, 2025, and the
5 time is 8:35 a.m. Pacific time. This is the remote
6 video deposition of Paul Simpson via Zoom
7 videoconference being taken in the matter of Bank of
8 America of California unemployment benefits
9 litigation. My name is Spencer Benveniste appearing
10 for Aptus Court Reporting, located at 401 West
11 A Street, Suite 1680, in San Diego, California
12 92101. I'm the official videographer, and this is
13 the only authorized video recording of this
14 deposition. The audio and video recording will take
15 place at all times unless all counsel agree to go
16 off the record.

17 Will counsel please identify yourselves and
18 state who you represent, after which the court
19 reporter, Shayna Lutsky, will swear in the witness.

20 MR. DANITZ: Brian Danitz of Cotchett,
21 Pitre & McCarthy for the plaintiffs.

22 MS. CHAN: This is Yvonne Chan from Jones
23 Day for Bank of America and the witness. And with
24 me are also Bayly Buck and Benjamin Shin from
25 Goodwin Procter.

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Paul Simpson

In Re Bank of America CA Unemployment Benefits Litigation

1 Brian, do you want to identify your
2 colleagues as well, the other plaintiff's counsel on
3 the line?

4 MR. DANITZ: No. Let's move on.

5 THE COURT REPORTER: Hello. My name is
6 Shayna Lutsky. My California CSR number is 14554.

7

8 PAUL SIMPSON,
9 having been administered an oath, was
10 examined and testified as follows:

11

12 EXAMINATION

13 BY MR. DANITZ:

14 Q Good morning, Mr. Simpson.

15 A Morning.

16 Q For the record, please state your full
17 name.

18 A Paul Howard Simpson.

19 Q Have you been deposed before?

20 A Yes. Not for this case.

21 Q So you know how this works, question and
22 answer?

23 A Yep.

24 Q Try not to step on each other's lines.

25 A Yep.

Paul Simpson Highly Confidential - Attorneys' Eyes Only
In Re Bank of America CA Unemployment Benefits Litigation

1 Q And you're under oath, and this has the
2 same force and effect as testimony at trial.

3 All right. So, Mr. Simpson, when did you
4 start at Bank of America?

5 A Sometime in 2011. I believe it was
6 May 2011.

7 Q And in 2020 what was your role?

8 A 2020 I was running a wholesale operations
9 and wholesale technology and operations for the
10 international businesses. So pretty much everything
11 wholesale nonconsumer.

12 Q And how did you get involved in the prepaid
13 card issue in 2020?

14 A I got involved in the prepaid card issue
15 because they asked me to take over running the call
16 centers for the unemployment benefits programs.

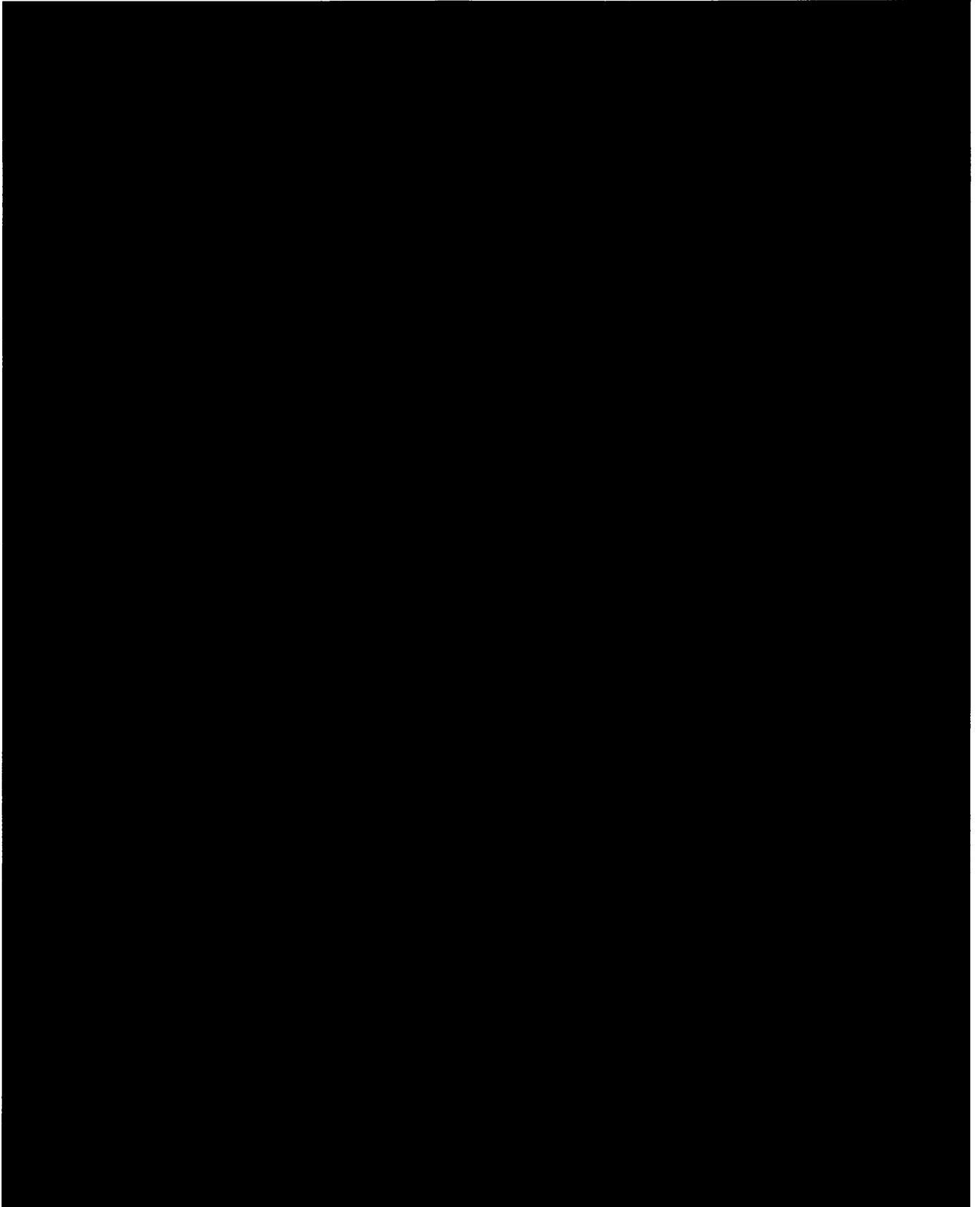
17 Q And around when was that?

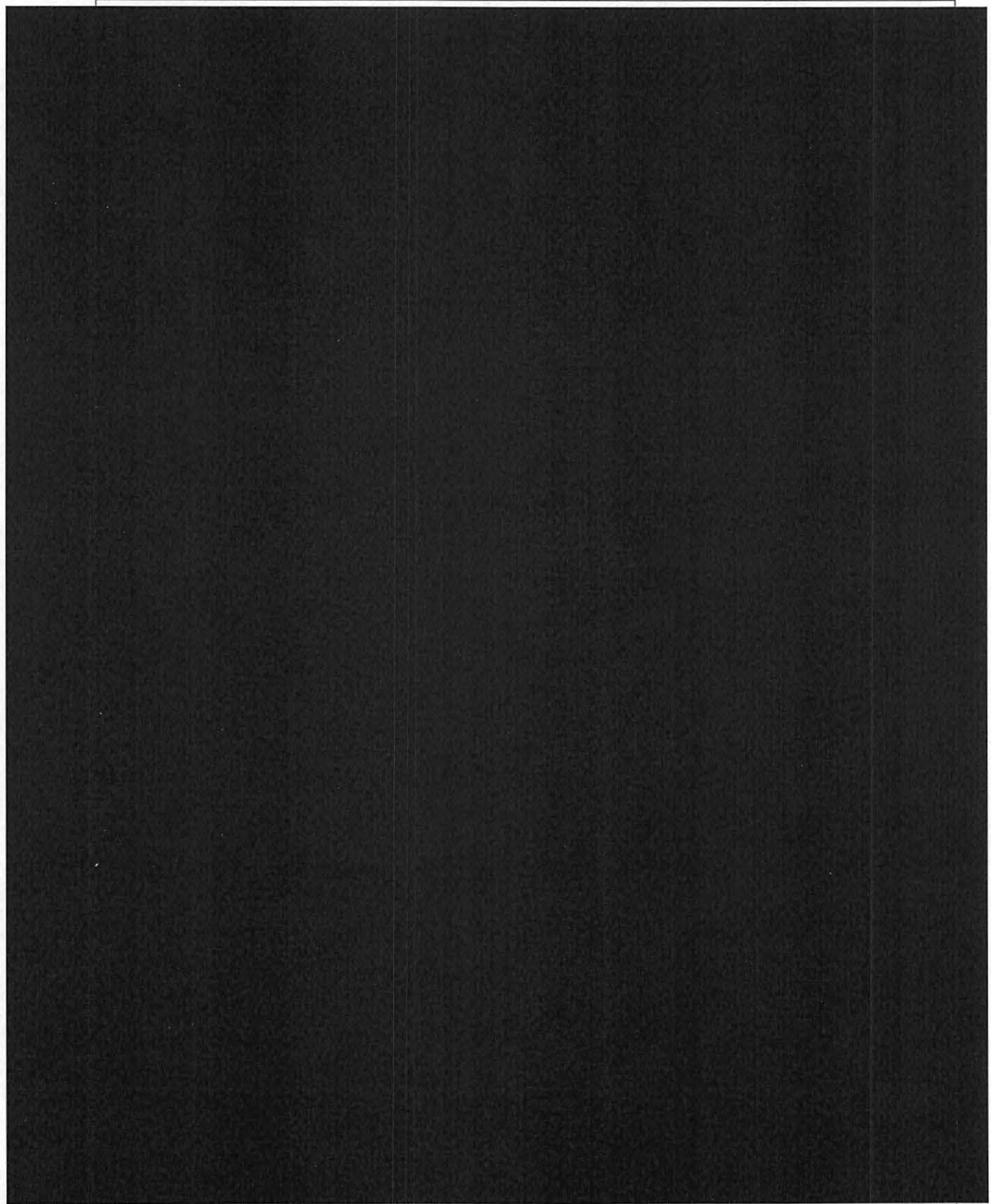
18 A It was definitely in -- in early pandemic.
19 I would say best recollection is probably sometime
20 late summer or mid summer.

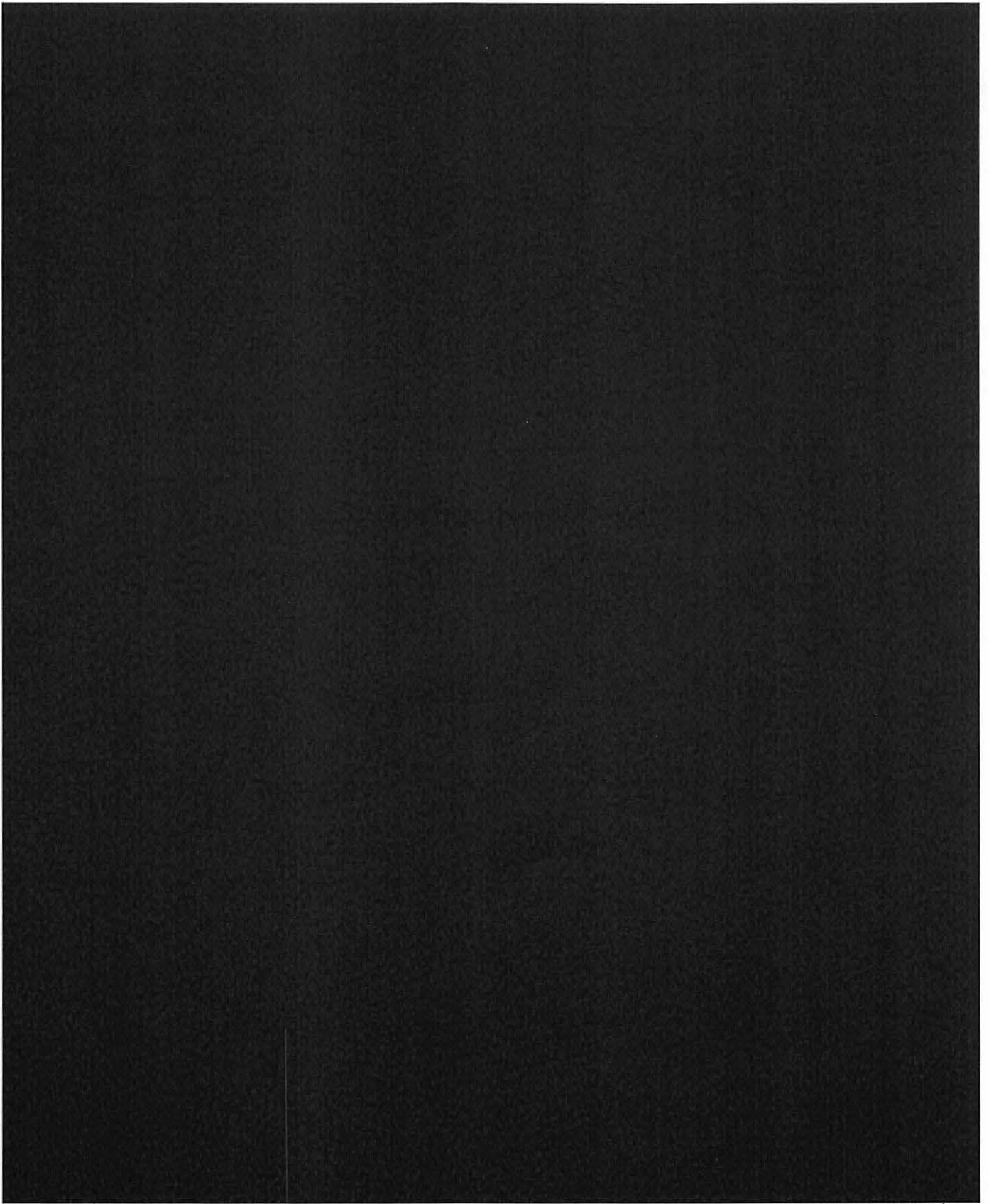
21 Q And sometime in the fall, the -- the claims
22 initiation call center wait lines were pretty long,
23 right?

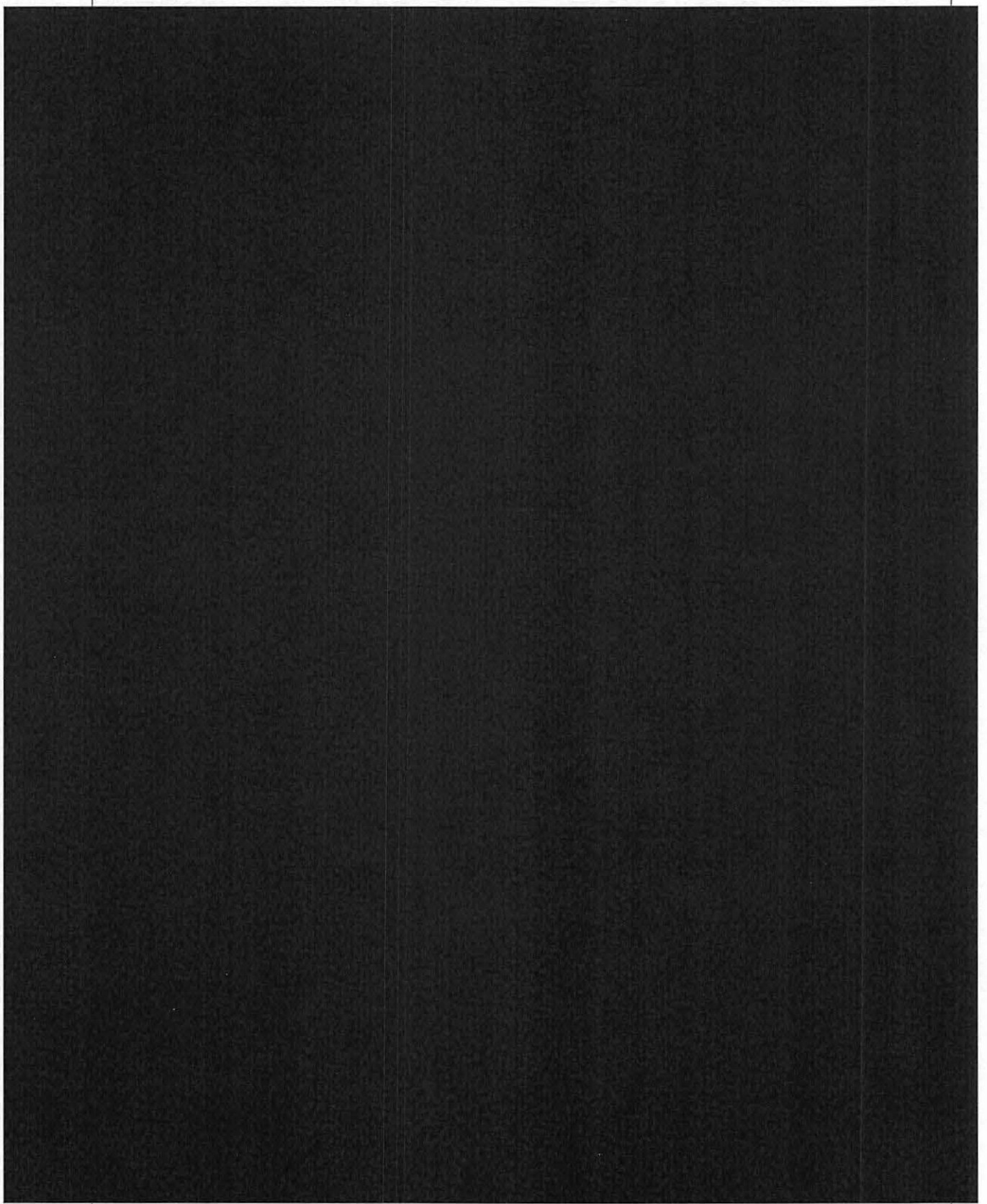
24 MS. CHAN: Objection.

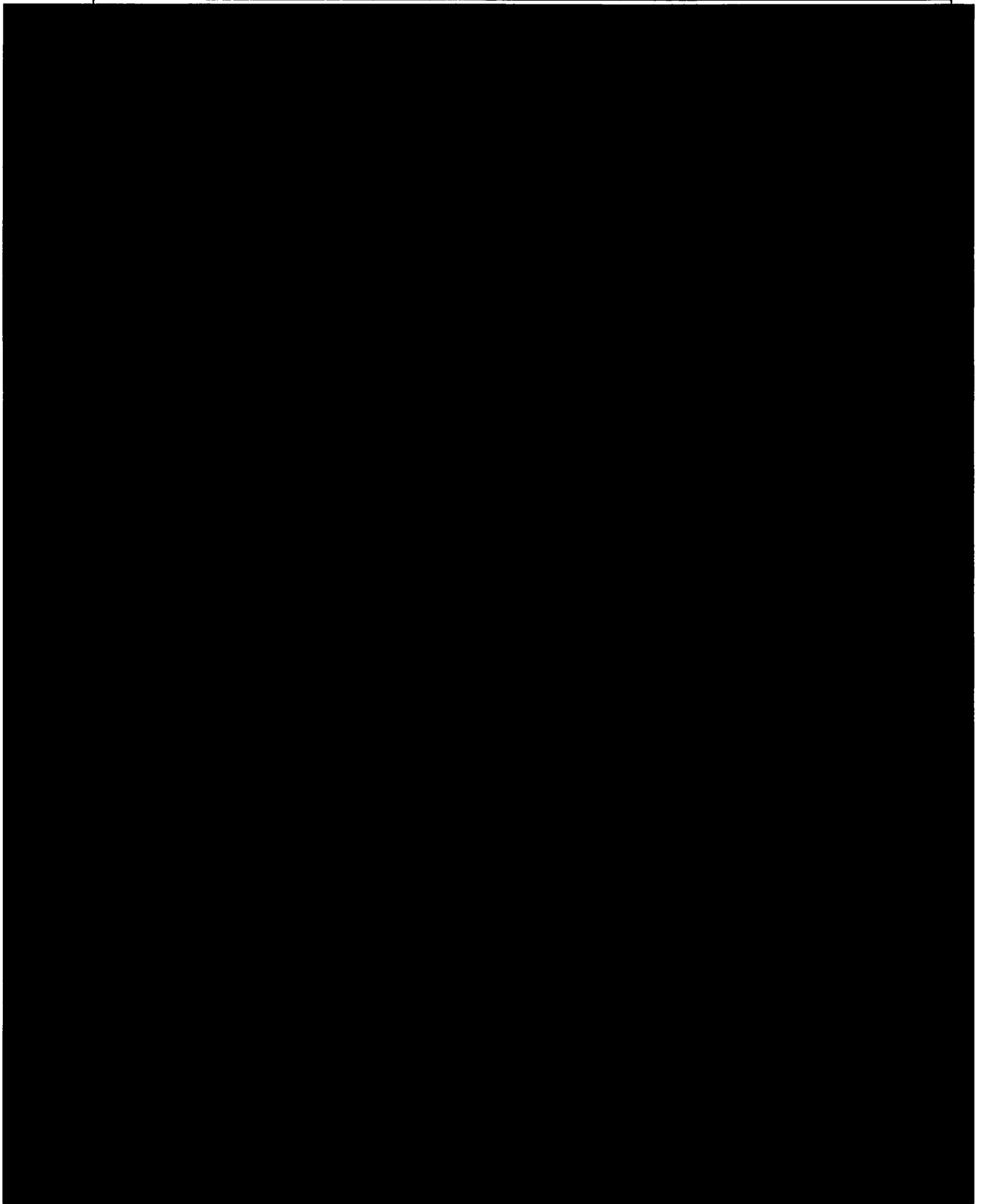
25 THE WITNESS: Yeah. I'd have to see the

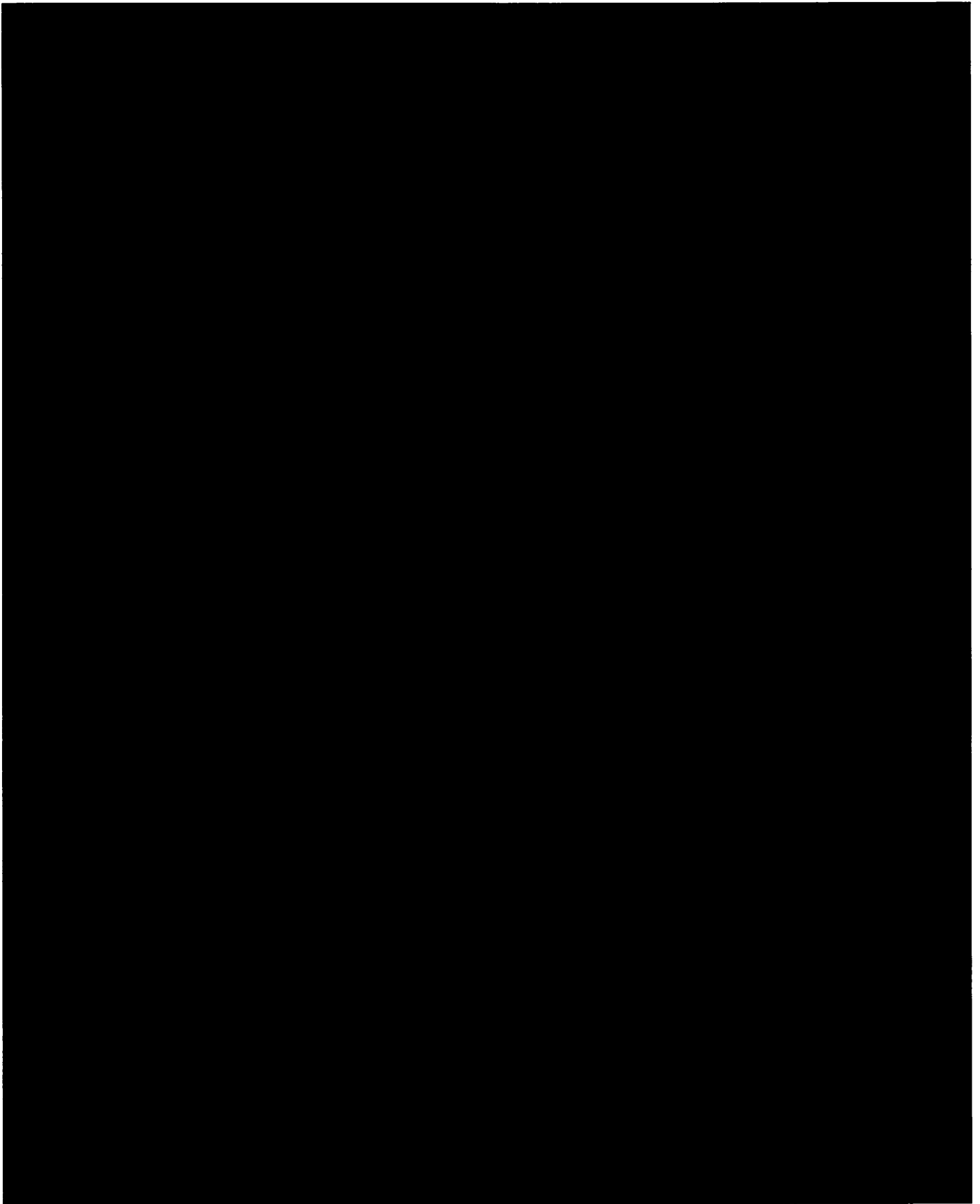


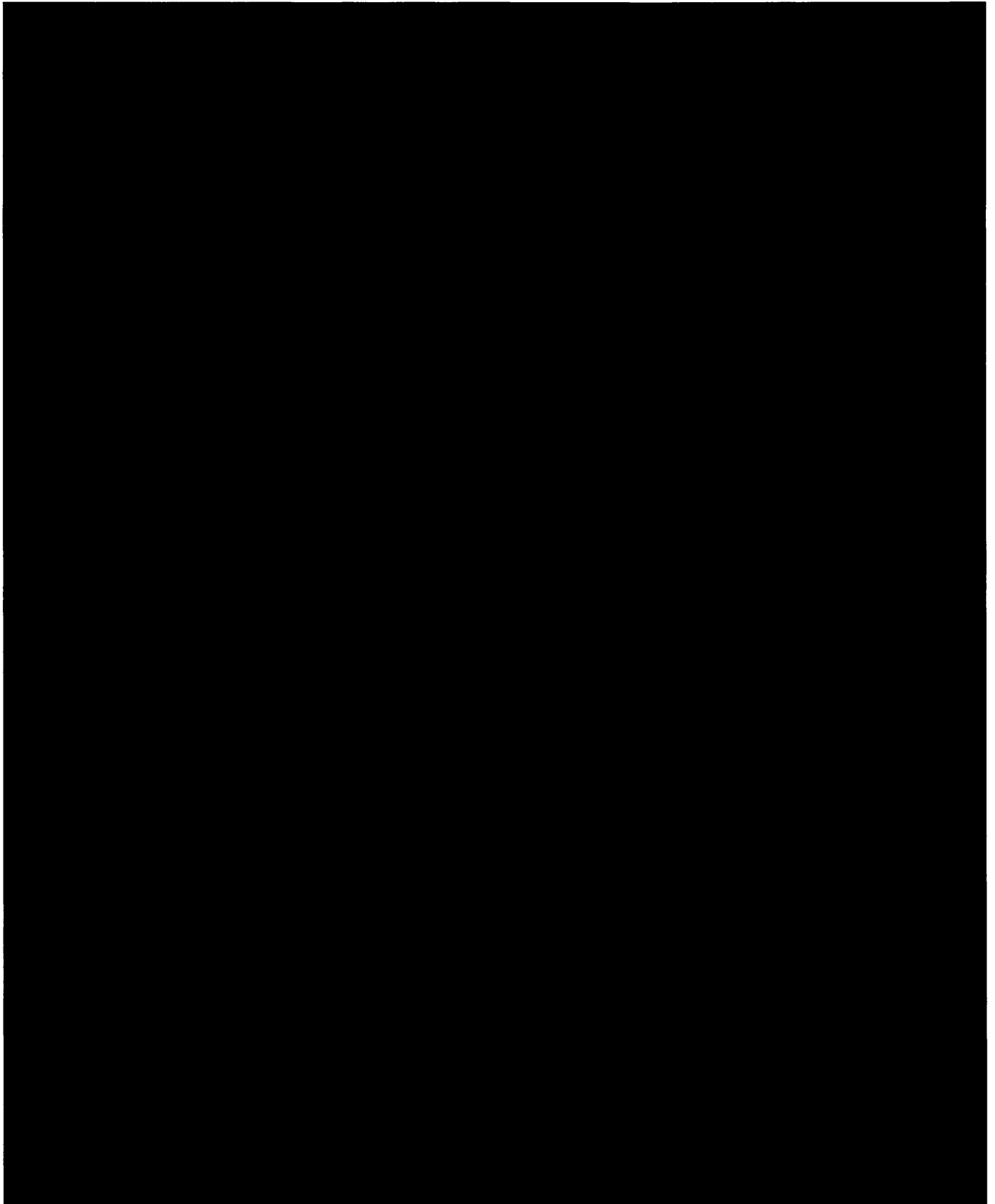


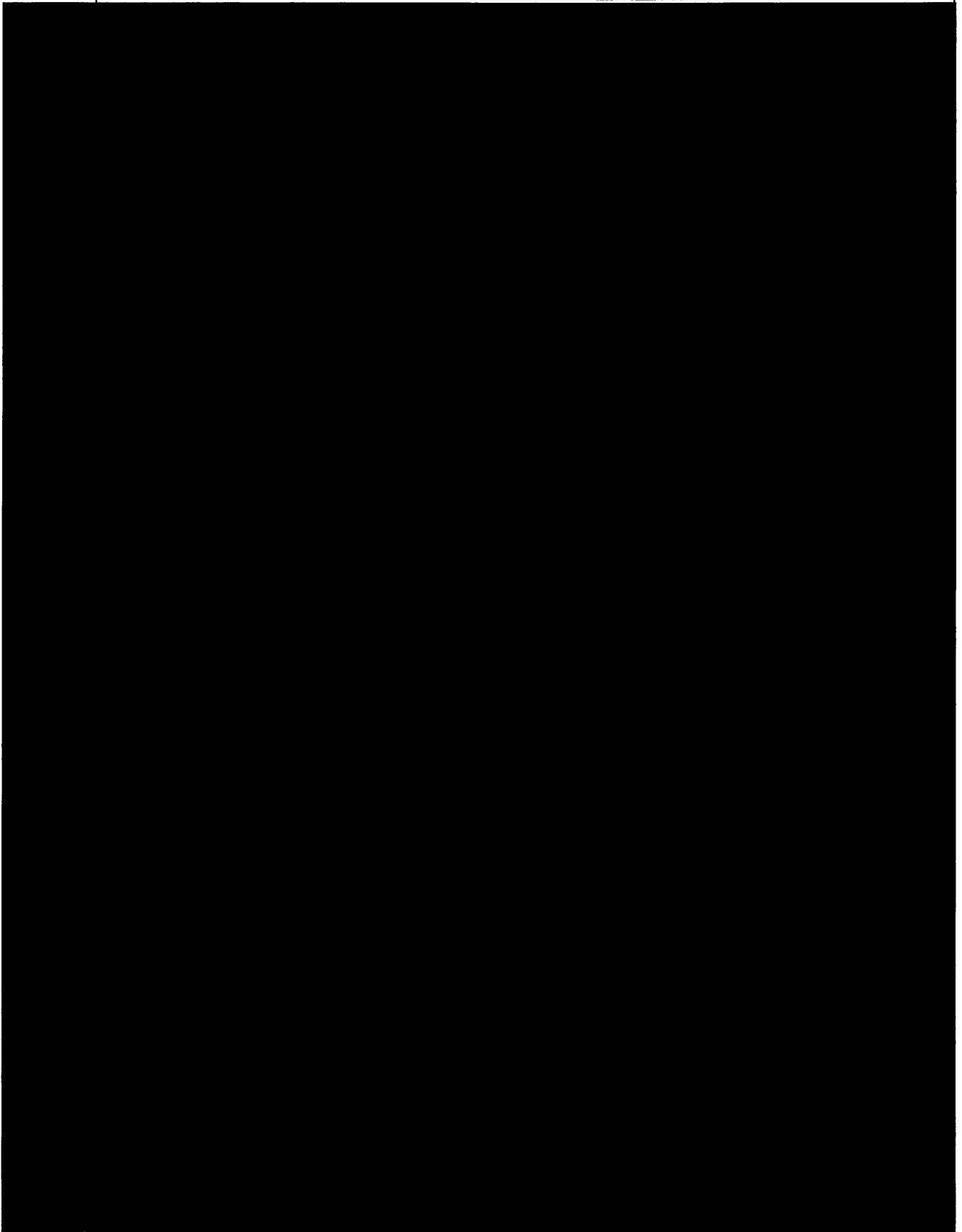


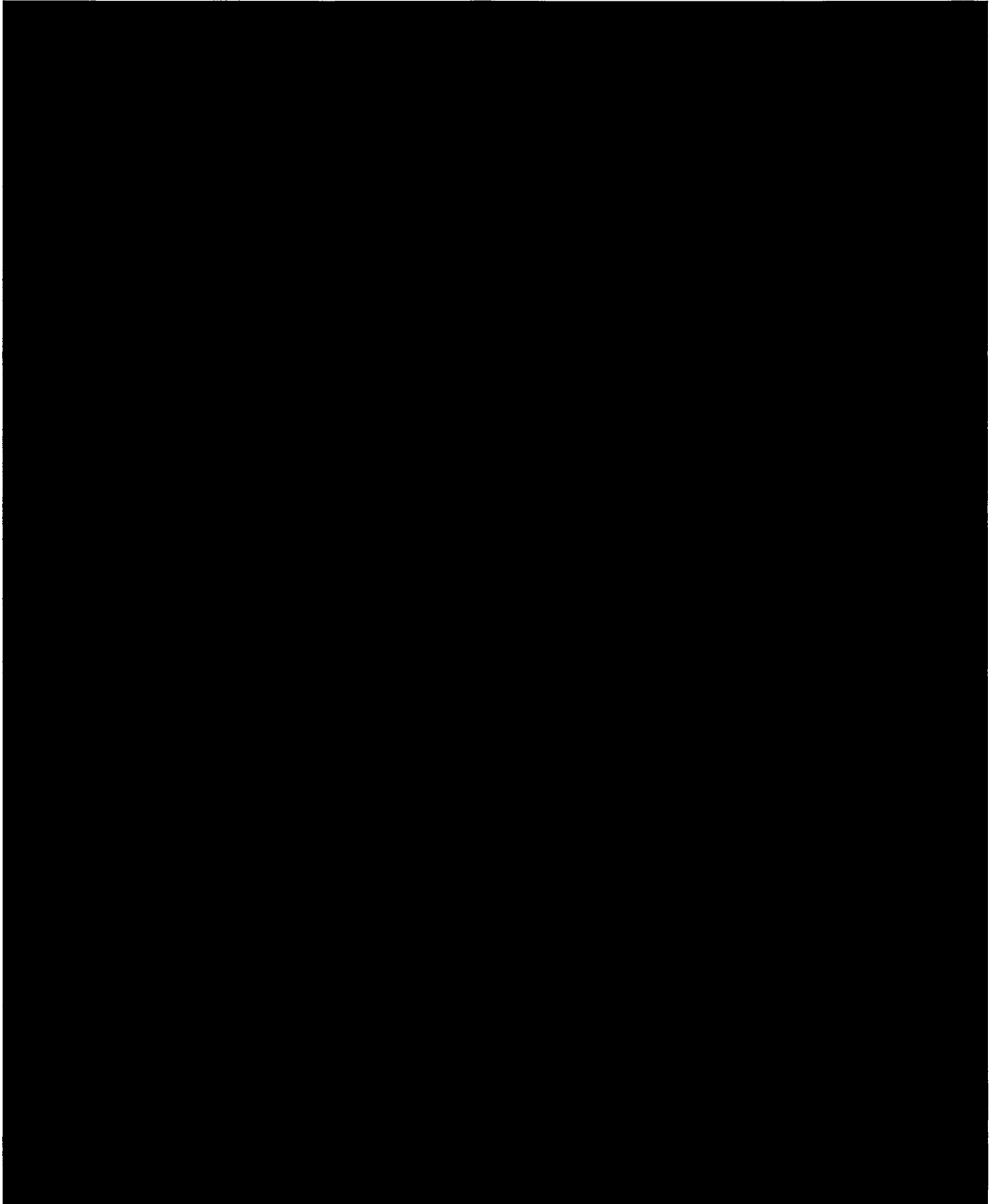


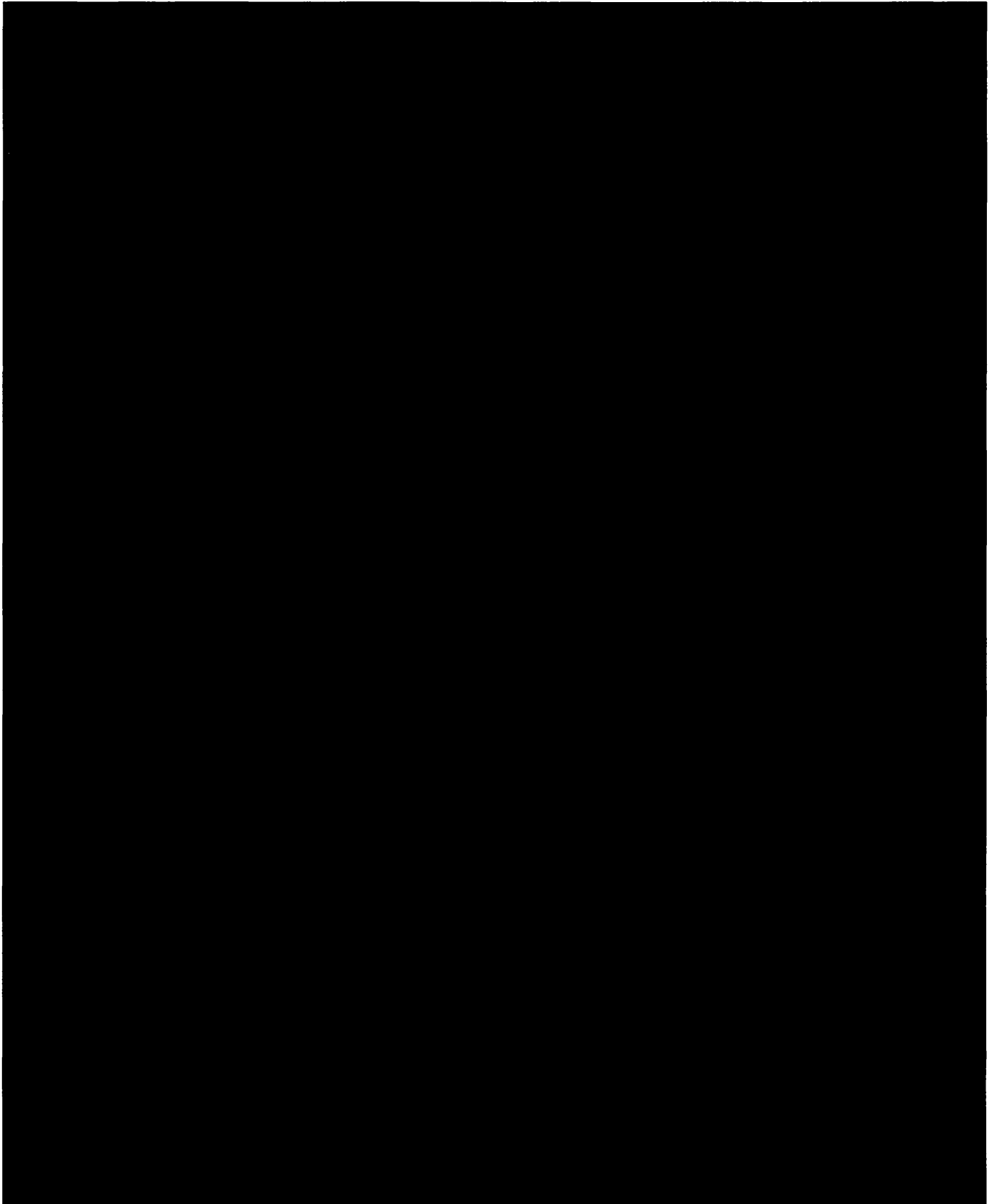


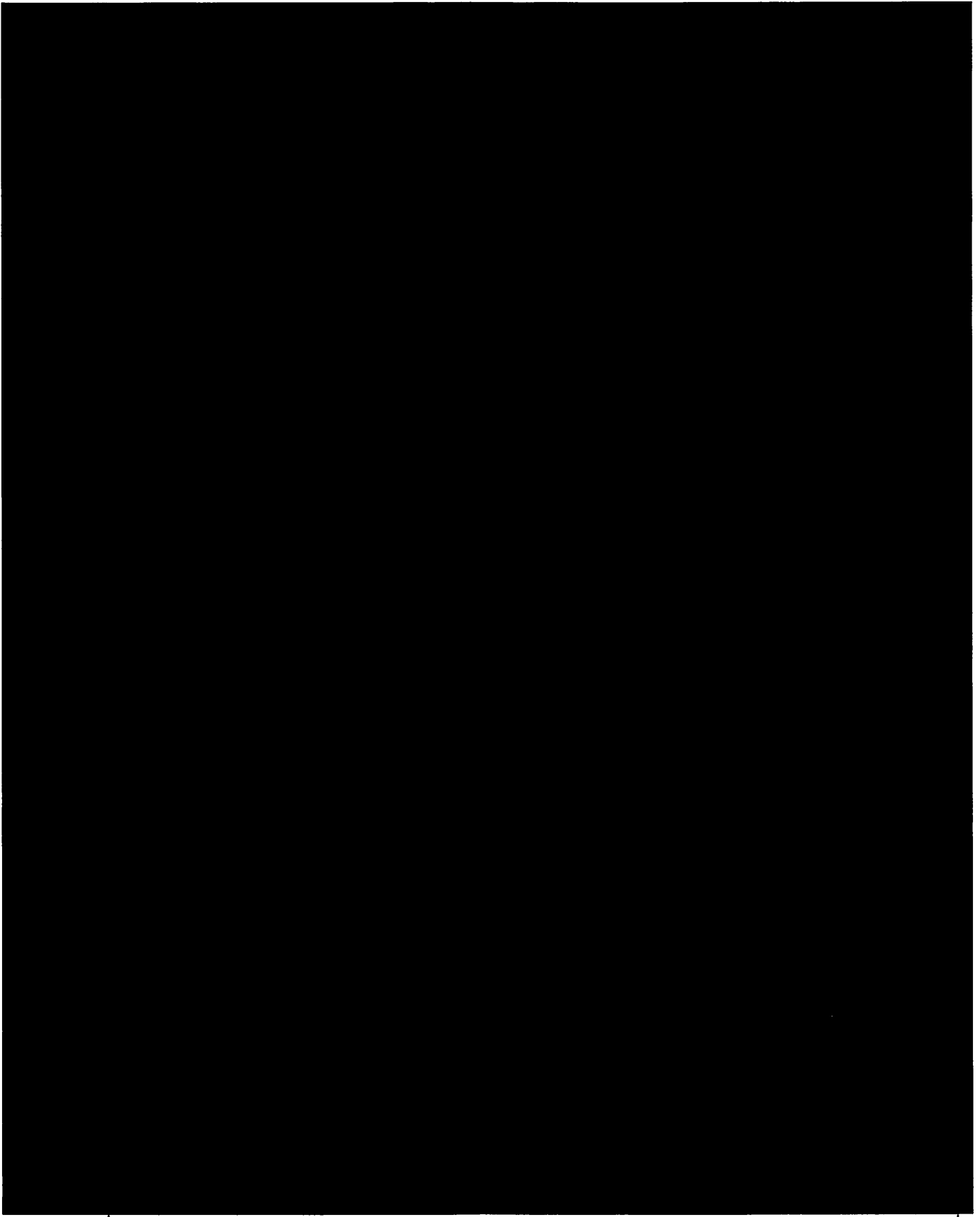


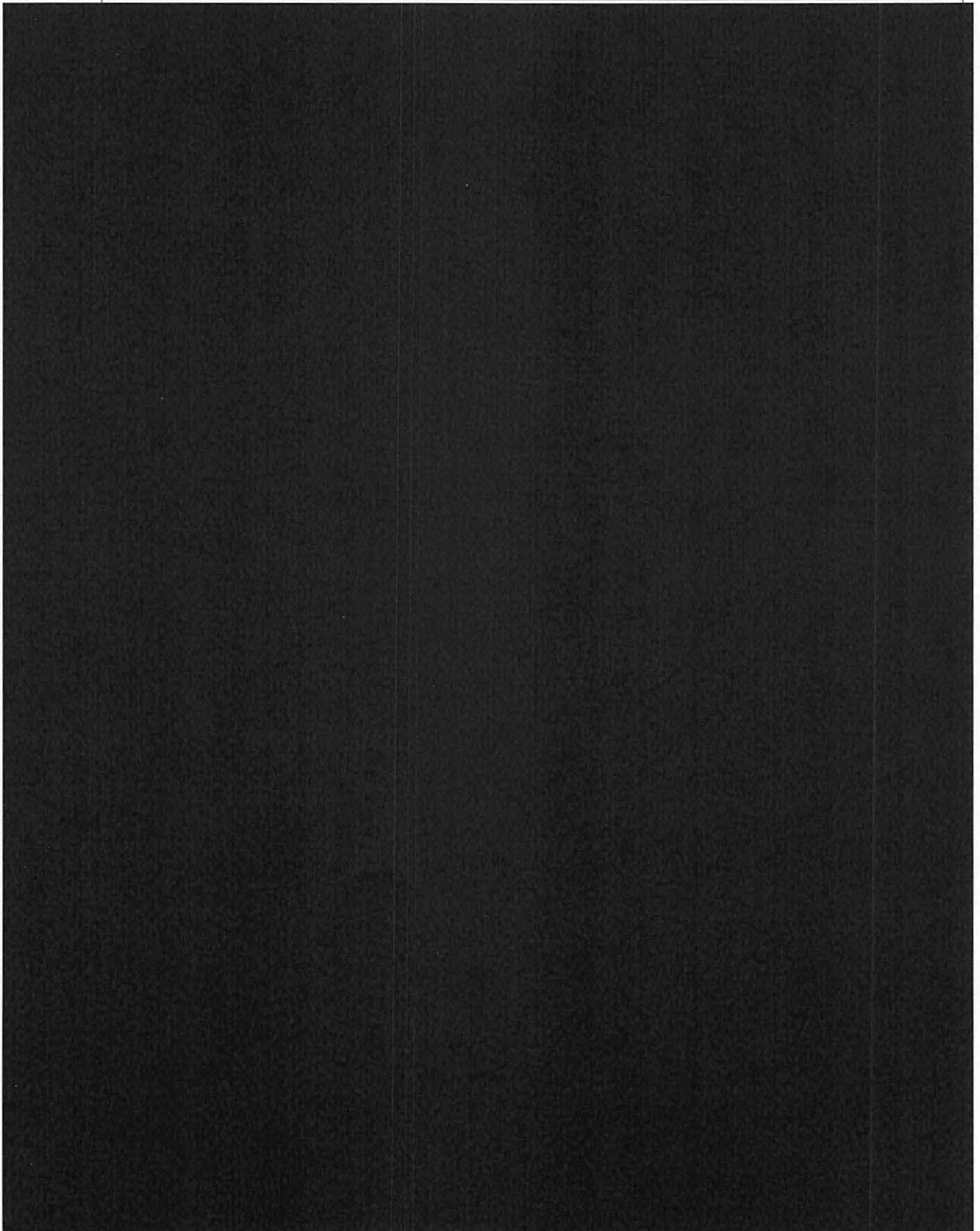


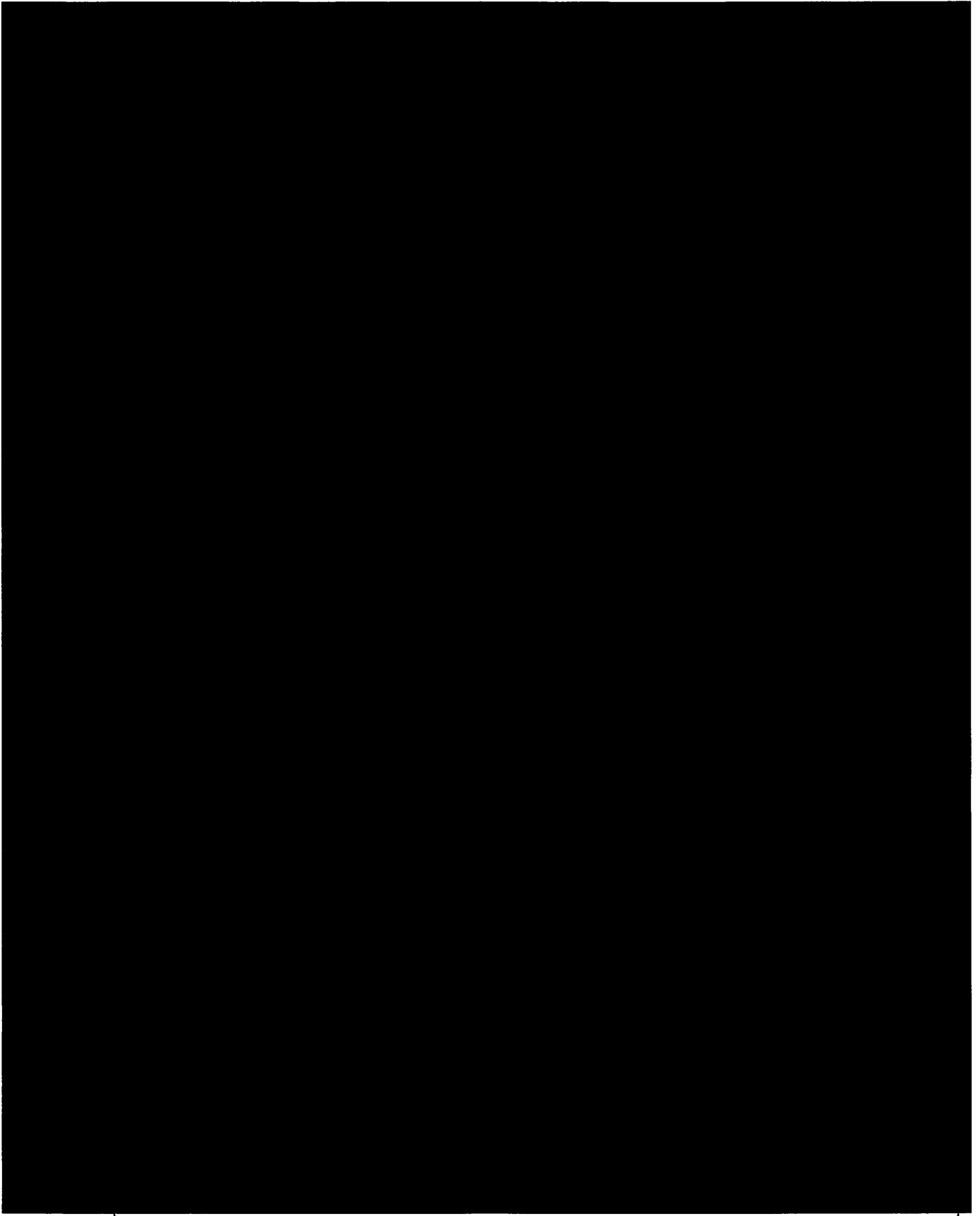


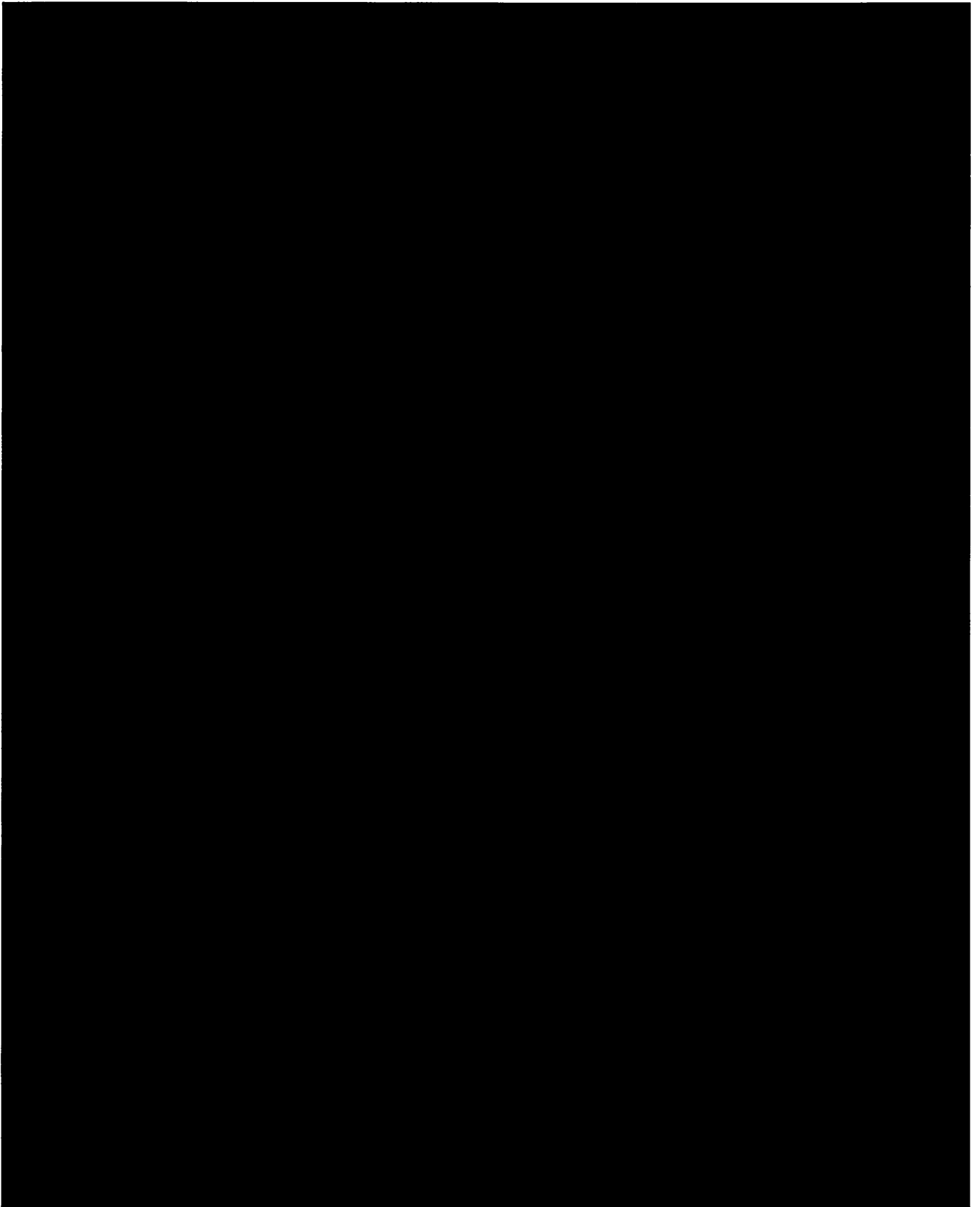


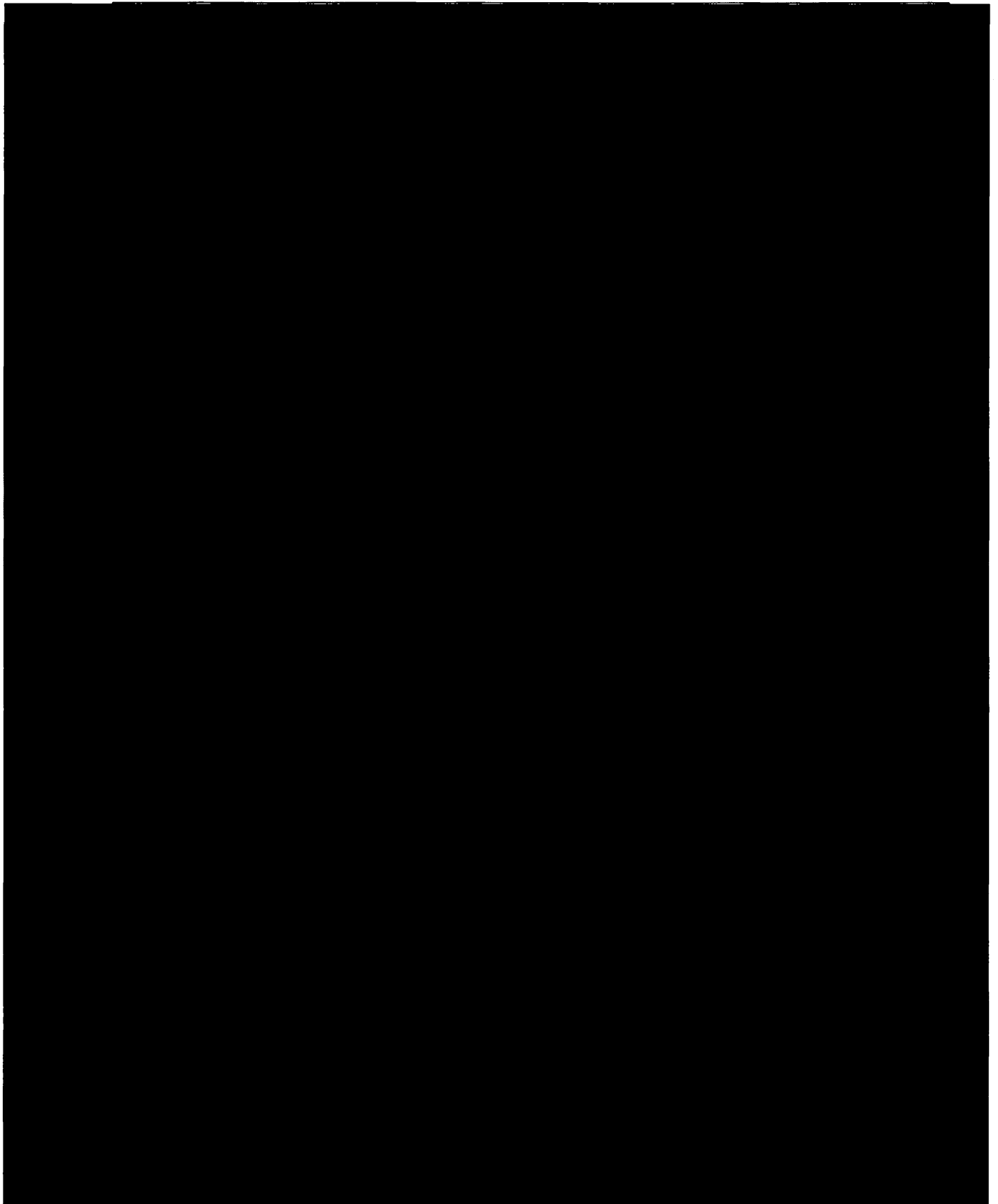












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REPORTER'S CERTIFICATE

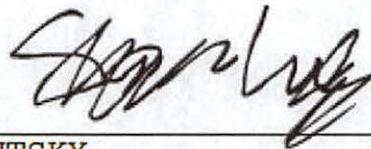
I, Shayna Lutsky, CSR 14554, a
Certified Shorthand Reporter in and for the State of
California, do hereby certify:

That prior to being examined, the
witness named in the foregoing proceedings declared
under penalty of perjury to testify to the truth,
the whole truth, and nothing but the truth;

That said proceedings were taken by
me in shorthand at the time and place herein named
and was thereafter transcribed into typewriting
under my direction, said transcript being a true and
correct transcription of my shorthand notes.

I further certify that I have no
interest in the outcome of this action.

Dated: February 24, 2025



SHAYNA LUTSKY
CSR 14554